

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

POULTRY PRODUCTS COMPANY OF
NEW ENGLAND, LLC; POULTRY
PRODUCTS COMPANY, LLC; POULTRY
PRODUCTS OF CONNECTICUT, LLC; and
POULTRY PRODUCTS OF MAINE, LLC

Plaintiffs,

vs.

TYSON FOODS, INC.; TYSON CHICKEN,
INC.; TYSON BREEDERS, INC.; TYSON
POULTRY, INC.; PILGRIM'S PRIDE
CORPORATION; KOCH FOODS, INC.; JCG
FOODS OF ALABAMA, LLC; JCG FOODS
OF GEORGIA, LLC; KOCH MEAT CO.,
INC.; SANDERSON FARMS, INC.;
SANDERSON FARMS, INC. (FOOD
DIVISION); SANDERSON FARMS, INC.
(PRODUCTION DIVISION); SANDERSON
FARMS, INC. (PROCESSING DIVISION);
HOUSE OF RAEFORD FARMS, INC.; MAR-
JAC POULTRY, INC.; PERDUE FARMS,
INC.; PERDUE FOODS, LLC; WAYNE
FARMS, LLC; SIMMONS FOODS, INC.;
SIMMONS PREPARED FOODS, INC.; O.K.
FOODS, INC.; O.K. FARMS, INC.; O.K.
INDUSTRIES, INC.; HARRISON POULTRY,
INC.; FOSTER FARMS, LLC; FOSTER
POULTRY FARMS; NORMAN W. FRIES,
INC. d/b/a CLAXTON POULTRY FARMS,
INC.; MOUNTAIRE FARMS, INC.;
MOUNTAIRE FARMS, LLC; MOUNTAIRE
FARMS OF DELAWARE, INC.; CASE
FOODS, INC.; CASE FARMS, LLC; CASE
FARMS PROCESSING, INC.; and AGRI
STATS, INC.,

Defendants.

Case No.: 21-cv-4358

COMPLAINT

Jury Trial Demanded

COMPLAINT

1. Plaintiffs Poultry Products Company of New England LLC (formerly known as Poultry Products Company of New England, Inc.), Poultry Products Company, LLC (formerly known as Poultry Products Company, Inc.), Poultry Products of Connecticut, LLC (formerly known as Poultry Products of Connecticut, Inc.), and Poultry Products of Maine, LLC (formerly known as Poultry Products of Main, Inc.), (collectively, “Poultry Products” or “Plaintiff”) are related New Hampshire corporations with a principal place of business in Londonderry, New Hampshire. Poultry Products is a foodservice distributor servicing New England and eastern New York. Poultry Products does business under the trade name Prime Source Foods.

2. Poultry Products brings this action under the federal antitrust laws against the Defendants identified below and incorporates by reference the factual allegations and reservations of rights contained in the Direct Action Plaintiffs’ Amended Consolidated Complaint and Demand for Jury Trial, filed in In re Broiler Antitrust Litigation, Civil Action No. 1:16-cv-08637 (ECF 4243; ECF 4244).

3. Poultry Products joins Section II of the Direct Action Plaintiffs’ Amended Consolidated Complaint and Demand for Jury Trial, adding the following to specify the Poultry Products causes of action and the Defendants in the Poultry Products’ action.

Plaintiff Name	Named Defendants¹	Named Co-Conspirators	Causes of Action
Poultry Products	Agri Stats; Claxton; Foster Farms; Harrison; House of Raeford; Koch; Mar-Jac; Mountaire; O.K. Foods; Perdue; Pilgrim's Pride; Sanderson; Simmons; Tyson; Wayne; Case	Fieldale; Amick; George's; Peco; Keystone; Allen Harim	Count I (Sherman Act Claim for all Anticompetitive Conduct); Count II (Sherman Act Claim for Output Restriction, Pled in the Alternative to Count I); Count III (Sherman Act Claim for GA Dock Manipulation, Pled in the Alternative to Count I)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Enter joint and several judgments against all Defendants in favor of Plaintiff;
- B. Award Plaintiff treble damages, of an amount to be determined at trial, to the maximum extent allowed under the federal antitrust laws;
- C. Award Plaintiff post-judgment interest as provided by law, with such interest to be awarded at the highest legal rate;
- D. Award Plaintiff its attorneys' fees, litigation expenses, and costs, as provided by law;
- E. Grant Plaintiff such other and further relief to which Plaintiff is entitled.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38, Plaintiff demands a trial by jury on all of its claims and issues so triable.

¹ The Defendants named in this Complaint include the entire Defendant family of each Defendant in this table, identified in Section IV.B of ECF 4243/ECF 4244.

Dated: August 16, 2021

Respectfully submitted,

/s/ Terence H. Campbell

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